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6 Attorneys for Defendants
7 Utica Comets, LLC, Syracuse Hockey Ownership
Team, LP, Larimer County Sports, LLC, Doing
8 Business as Colorado Eagles Pro Hockey,
Cavaliers Hockey Holdings, LLC
9

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

12
13 ASSOCIATED PRODUCTION MUSIC
14 LLC, a New York limited liability
company,

15 Plaintiff,

16 v.

17 AMERICAN HOCKEY LEAGUE, a
Massachusetts nonprofit corporation;
18 UTICA COMETS, LLC, a New York
limited liability company; HERSHEY
19 ENTERTAINMENT & RESORTS
COMPANY, a Pennsylvania corporation;
20 ONTARIO REIGN HOCKEY CLUB,
LLC, a Delaware limited liability company;
21 SYRACUSE HOCKEY OWNERSHIP
TEAM, LP, a New York limited
22 partnership; ICEARIZONA AHL CO LLC,
a Delaware limited liability company;
23 LARIMER COUNTRY SPORTS, LLC,
doing business as Colorado Eagles Pro
24 Hockey, a Colorado limited liability
company; CAVALIERS OPERATING
25 COMPANY, LLC, a Delaware limited
liability company; CHICAGO
26 BLACKHAWK HOCKEY TEAM, INC. a
Delaware corporation; CAPITAL SPORTS
27 & ENTERTAINMENT INC., a Delaware
corporation; and DOES 1-10, inclusive,
28

Case No. 2:24-CV-07803-RGK-
AJR

**NOTICE OF MOTION TO
DISMISS PLAINTIFF'S FIRST
AMENDED COMPLAINT FOR
LACK OF JURISDICTION
[FRCP 12(B)(2)], IMPROPER
VENUE [FRCP 12(B)(3)],
FORUM NON CONVENIENS,
AND FAILURE TO STATE A
CLAIM [FRCP 12(B)(6)]**

*Filed concurrently with
Memorandum of Points and
Authorities, Declarations of Adam
Pawlick, Megan Cahill, Michael
Ostrowski, Ryan Bach, and
[Proposed] Order*

Judge: Hon. R. Gary Klausner
Hearing Date: March 3, 2025
Time: 9:00 a.m.
Place: Ctrm 850
Complaint Filed: Sept. 12, 2024

1 Defendants.

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3 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF
4 RECORD:

5 PLEASE TAKE NOTICE THAT on March 3, 2025 or as soon thereafter as
6 the matter may be heard in Courtroom 850 before the Honorable R. Gary Klausner
7 of the above-entitled court—located at Roybal Federal Building and U.S.
8 Courthouse, 255 East Temple Street, Los Angeles, CA 90012 —

9 Defendants Utica Comets, LLC, Syracuse Hockey Ownership Team, LP,
10 Larimer County Sports, LLC, Doing Business as Colorado Eagles Pro Hockey,
11 Cavaliers Hockey Holdings, LLC will and hereby do move to dismiss, due to the
12 absence of personal jurisdiction under Fed. R. Civ. Proc. 12(b)(2), defective venue
13 under Fed. R. Civ. Proc. 12(b)(3) and 28 U.S.C. § 1406, or in the alternative due to
14 the convenience of the parties and witnesses and in the interests of justice under 28
15 U.S.C. § 1404; and further for a failure to state a claim for relief under Rule
16 12(b)(6) as Plaintiff has failed to allege standing.

17 The motion is based upon this notice and motion, the accompanying
18 memorandum of points and authorities, the declarations of Adam Pawlick, Megan
19 Cahill, Ryan Bach, and Michael Ostrowski, as well as the exhibits corresponding
20 thereto, all other papers on file in this action, all matters of which the Court may
21 properly take judicial notice, and any further documentary evidence and oral
22 argument that this Court may accept during the hearing.
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1 Certification Under L.R. 7-3

2 This motion is made following the conference of counsel pursuant to L.R. 7-
3 3 which took place on December 12, 2024 as well as a subsequent supplemental
4 discussions which took place on December 18, 2024, and January 17, 2025.

5 Dated: January 27, 2025

6 Respectfully Submitted,

7 GORDON REES SCULLY
8 MANSUKHANI, LLP

9 By: /s/ Sean D Flaherty

10 Sean D. Flaherty
11 Alison M. Pringle
12 Attorneys for Defendants
13 Utica Comets, LLC, Syracuse
14 Hockey Ownership Team, LP,
15 Larimer County Sports, LLC, Doing
16 Business as Colorado Eagles Pro
17 Hockey, Cavaliers Hockey Holdings,
18 LLC